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October 28, 2025

Via ECF

Honorable Taryn A. Merkl
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: Trabacchi v. Department of Education of the City of New York, et al.
24-cv-06123 (RPK)(TAM)

Dear Magistrate Judge Merkl:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York, assigned to represent Defendant Department of Education of the City of New York (“DOE”) in the above-referenced action. I write to respectfully request an extension of time to December 4, 2025, for the DOE to respond to the amended complaint. This is the DOE’s first request for an extension of time to respond to the amended complaint and the requested extension does not affect any scheduled dates. Although not entirely clear, it appears that pro se Plaintiff is only willing to consent to an extension if Defendant agrees that individual defendant Katherine Rodi was properly served at 100 Church Street and informs the Court that it was mistaken in claiming otherwise in its Motion to Dismiss the Complaint. Defendant, however, does not agree that service on Rodi was proper. Thus, it appears that Plaintiff opposes the requested extension.

The amended complaint contains numerous allegations of discrimination against DOE and two individual defendants. Pursuant to this Court’s October 20, 2025, Order, Plaintiff is required to file proof of service on individual defendants Rodi and Melissa Aviles-Ramos by November 20, 2025. The requested extension of time will allow the undersigned to assess whether service was proper on the individual defendants, make representation decisions and enter a notice

of appearance if appropriate,¹ and determine how to appropriately respond to the amended complaint on behalf of the DOE and individual defendants. Accordingly, the DOE respectfully requests an extension of time to December 4, 2025, to file its response to the Amended Complaint.

I thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Brigid Lynn

Brigid Lynn

¹ Although the undersigned is not entering a notice of appearance on behalf of Rodi or Aviles-Ramos, at this time, the undersigned requests their time also be extended to December 4, 2025, so that the DOE's and these individual defendants' responses will be due on the same date.